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Defendant Feras Antoon*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-4786-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

1 N.L.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 L.T.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04788-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

Case No. 2:24-cv-04791-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS RELATED
TO OMNIBUS OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

1 T.C.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 X.N.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04795-WLH-ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE
UNDER SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 7, 2024

Trial Date: not set

Case No. 2:24-cv-04800-WLH-ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE
UNDER SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 7, 2024

Trial Date: not set

1 N.Y.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 J.C.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-4801-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

Case No. 2:24-cv-04971-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 12, 2024
Trial Date: not set

1 W.L.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 C.S.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04977-WLH-ADS

DECLARATION OF JASON BROWN IN SUPPORT OF PLAINTIFFS' APPLICATION FOR LEAVE TO FILE UNDER SEAL MATERIALS RELATED TO OMNIBUS OPPOSITION

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

Case No. 2:24-cv-04992-WLH-ADS

DECLARATION OF JASON BROWN IN SUPPORT OF PLAINTIFFS' APPLICATION FOR LEAVE TO FILE UNDER SEAL MATERIALS RELATED TO OMNIBUS OPPOSITION

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

1 S.O.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 L.S.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04998-WLH-ADS

DECLARATION OF JASON BROWN IN SUPPORT OF PLAINTIFFS' APPLICATION FOR LEAVE TO FILE UNDER SEAL MATERIALS RELATED TO OMNIBUS OPPOSITION

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 13, 2024

Trial Date: not set

Case No. 2:24-cv-05026-WLH-ADS

DECLARATION OF JASON BROWN IN SUPPORT OF PLAINTIFFS' APPLICATION FOR LEAVE TO FILE UNDER SEAL MATERIALS RELATED TO OMNIBUS OPPOSITION

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: June 14, 2024

Trial Date: not set

1 W.P.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 DOE FUNDS 1-7; COLBECK CAPITAL
19 MANAGEMENT, LLC, a Delaware
20 limited liability company; COLBECK
21 DOE FUNDS 1-3,

22 Defendants.

23 A.K.,

24 Plaintiff,

25 v.

26 MINDGEEK S.A.R.L. a foreign entity;
27 MG FREESITES, LTD., a foreign entity;
28 MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-05185-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 20, 2024
Trial Date: not set

Case No. 2:24-cv-05190-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 20, 2024
Trial Date: not set

1 J.L.,

2 Plaintiff,

3 v.

4 MINDGEEK S.A.R.L. a foreign entity;
5 MG FREESITES, LTD., a foreign entity;
6 MINDGEEK USA INCORPORATED, a
7 Delaware corporation; MG PREMIUM
8 LTD, a foreign entity; MG GLOBAL
9 ENTERTAINMENT INC., a Delaware
10 corporation; 9219-1568 QUEBEC, INC.,
11 foreign entity; BERND BERGMAIR, a
12 foreign individual; FERAS ANTOON, a
13 foreign individual; DAVID TASSILLO, a
14 foreign individual; VISA INC., a Delaware
15 corporation; REDWOOD CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; REDWOOD
18 MASTER FUND, LTD, a foreign
19 entity; MANUEL 2018, LLC, a
20 Delaware limited liability company;
21 GINOGERUM, LLC, a Delaware
22 limited liability company; WHITE
23 HATHAWAY OPPORTUNITY, LLC,
24 a Delaware limited liability company, CB
25 MEDIA VENTURES LLC, a Delaware
26 limited liability company; CB AGENCY
27 SERVICES, LLC, a Delaware limited
28 liability company; and CB
PARTICIPATIONS SPV, LLC, a
Delaware limited liability company,

Defendants.

Case No. 2:24-cv-07046-WLH-
ADS

**DECLARATION OF JASON
BROWN IN SUPPORT OF
PLAINTIFFS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL MATERIALS
RELATED TO OMNIBUS
OPPOSITION**

Hearing Date: January 31, 2025

Hearing Time: 1:30 p.m.

Courtroom: 9B

Judge: Hon. Wesley Hsu

Complaint Filed: August 20, 2024

Trial Date: not set

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4 I, Jason Brown, Esq., hereby state to the best of my personal knowledge and
5 belief:

6 1. I am a partner at the law firm of Cohen & Gresser LLP, attorneys of
7 record in the above-referenced actions for specially-appearing Defendant Feras
8 Antoon. I have been granted permission by this Court to appear *pro hac vice* as
9 counsel for Mr. Antoon in these actions.

10 **A. Confidential Material**

11 2. I submit this Declaration in support of the December 12, 2024
12 Application for Leave to File Under Seal Materials Related to Omnibus Opposition
13 (ECF No. 95) (the “Application”) filed by Plaintiff in *K.A. v. MindGeek S.a.r.l.*,
14 Case No. 24-cv-4786-WLH-ADS, and by Plaintiffs in the 13 additional related
15 lawsuits before this court, *see* ECF No. 52, Ex. 1 (collectively “Plaintiffs”) which
16 seeks permission to seal material previously designated as “Confidential” or
17 “Highly Confidential” pursuant to the Amended Stipulated Protective Order (the
18 “Protective Order”) entered by the Court on December 13, 2024, Dkt. 516, in the
19 related case, *Fleites v. MindGeek S.a.r.l. et al.*, Case No. 21-cv-4920-WLH-ADS
20 (the “Fleites Action”).

21 3. Mr. Antoon supports the Application to the extent it seeks leave to file
22 under seal material that (a) Mr. Antoon produced in discovery in the Fleites Action
23 and designated as “Confidential” or “Highly Confidential” pursuant to the
24 Protective Order (together, the “Confidential Material”), or (b) has been referenced
25 in either (i) Plaintiffs’ December 12, 2024 Omnibus Opposition to Defendants’
26 Motions to Dismiss (the “Opposition”) (ECF No. 93), or (ii) the December 12,
27 2024 Declaration of Michael J. Bowe in Support of Plaintiffs’ Opposition to
28 Defendants’ Motions to Dismiss (the “Bowe Declaration”) (ECF No. 92) and the
exhibits attached thereto.

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3 4. Mr. Antoon further supports the Application to the extent it seeks
4 leave to file under seal Confidential Material that was both (a) referenced in either
5 the Opposition or the Bowe Declaration, and (b) publicly filed on the docket in the
6 form of a document containing redacted Confidential Material proposed to be filed
7 under seal.

8 5. The Confidential Material reflects confidential information
9 concerning Mr. Antoon's (i) assets, including compensation paid for economic
10 interests in MindGeek S.a.r.l.; (ii) salary, bonus and/or dividend payments received
11 while employed as the CEO of 9219-1568 Quebec, Inc. ("9219-1568 Inc.");
12 (iii) other personally identifiable information; and (iv) rights received and
13 exercised in connection with economic interests in MindGeek S.a.r.l.

14 **B. Standard for Sealing**

15 6. Public access to judicial records may be "denied where court files
16 might [] become a vehicle for improper purposes," including to "gratify private
17 spite or promote public scandal" or to "harm a litigant's competitive standing."
18 *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598 (1978) (internal quotation
19 marks omitted). And the common law right of access to judicial records may be
20 overridden upon a showing of "sufficiently compelling reasons" to restrict access.
21 *Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003).

22 7. A party seeking leave to seal confidential information in response to
23 dispositive motions, like the Opposition, must "articulate [] compelling reasons
24 supported by specific factual findings" that outweigh the public right of access.
25 *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006)
26 (internal quotation marks omitted). Upon a showing of compelling reasons, the
27 court must conscientiously balance the competing interests of the public and the
28 party seeking leave to file under seal. *Id.* at 1179.

1
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3 8. Compelling reasons to justify sealing include safeguarding the privacy
4 of “personally identifiable information including salaries.” Order Re: Defs.’
5 Renewed Appl. for Leave to File Under Seal, *United States ex rel. IONM LLC v.*
6 *Univ. of S. California*, No. 2:18-CV-08311 (WLH) (AS), (C.D. Cal. Aug. 12,
7 2024), ECF No. 348, at *2 (internal quotation marks omitted) (granting application
8 to seal employment records containing personally identifiable information such as
9 names, salaries, and terms of employment and financial and proprietary data
10 implicating the privacy interests of the employer and its individual employees).
11 *See also Richter v. Oracle Am., Inc.*, No. 22-CV-04795-BLF, 2023 WL 5663217,
12 at *2 (N.D. Cal. Aug. 30, 2023) (granting motion to seal personal financial
13 information, finding that compelling reasons exist to seal and prevent harmful use
14 of the information); *Gomo v. NetApp, Inc.*, No. 1:17-CV-02990 (BLF), 2019 WL
15 1170775, at *3 (N.D. Cal. Mar. 13, 2019) (sealing exhibits containing non-public,
16 confidential information regarding defendant corporation’s compensation plan and
17 executives).

18 9. Courts have also found compelling reasons to seal records reflecting
19 business transactions, corporate structure, compensation practices, and finances,
20 the public disclosure of any of which could harm a party’s competitive standing.
21 *See, e.g., Bold Ltd. v. Rocket Resume, Inc.*, No. 5:22-CV-01045 (BLF), 2024 WL
22 1329921, at *2 (N.D. Cal. Mar. 27, 2024) (“Compelling reasons exist to seal
23 confidential business information, including non-public information about a
24 company’s business strategy, business transactions, corporate structure, and
25 finances.”).

26 **C. Conclusion**

27 10. The Opposition and Exhibits 3 and 18 to the Bowe Declaration
28 contain sensitive non-public information implicating either (i) Mr. Antoon’s
personally identifiable information, including financial information or rights in

connection with economic interest, or (ii) the MindGeek Defendants' internal business strategy or practices, transactions, financial information, or corporate structure.

11. Accordingly, Mr. Antoon supports Plaintiffs' Application seeking leave to seal and/or redact this information from the public record as specified in the below chart.

Document	Material to be Sealed	Basis for Sealing
Exhibit 3 (containing excerpts to the June 14, 2023 deposition of Mr. Antoon) to the Declaration of Michael J. Bowe in Support of Plaintiffs' Opposition to Defendants' Motions to Dismiss (ECF No. 92-3)	Sealed in its entirety	Mr. Antoon's personal financial information or rights in connection with economic interest; other personally identifiable information; Defendant MindGeek's business strategy and internal structure.
Exhibit 18 (Mr. Antoon's September 22, 2022 Responses and Objections to Plaintiff's First Set of Interrogatories) to the Declaration of Michael J. Bowe in Support of Plaintiffs' Opposition to Defendants' Motions to Dismiss (ECF No. 92-18)	Page 6, Lines 3-21; Page 7, Lines 14-28; Page 8, Lines 1-5; and Page 9, Lines 14-23.	Mr. Antoon's personally identifiable information; Defendant MindGeek's business strategy.

Document	Material to be Sealed	Basis for Sealing
Plaintiffs' Omnibus Opposition to Defendants' Motions to Dismiss (ECF No. 93)	Page 60, Lines 12-15, 17-28; Page 61, Lines 1-3, 14-28; Page 62, Lines 1-2; Page 70, Lines 7-12, 14-20, 23-28; Page 71, Lines 1-9; and Page 72, Lines 5-10.	Defendant MindGeek's business strategy, transactions, finances, and structure; Mr. Antoon's personal financial information or rights in connection with economic interest.

12. Mr. Antoon's request to seal is narrowly tailored. A less restrictive alternative to sealing is not sufficient because the entirety of the information sought to be sealed discloses the Confidential Material described above.

13. Accordingly, Mr. Antoon respectfully requests that the Court grant the Application.

14. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: December 17, 2024


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New York, New York 10022
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Defendant Feras Antoon*